

Battaglia, Frank

From: Joseph F Guarnaccia <joseph.guarnaccia@basf.com>
Sent: Saturday, June 10, 2017 9:56 AM
To: Battaglia, Frank
Subject: RE: RCRA project scope
Attachments: DEM letter 10_2000.PDF

Categories: Red Category

Frank
I look forward to speaking w/ you. I hope we are close.

On another matter: pulling Bellefont out of the RCRA Closure. Is that complete?

This is an excerpt from the RIDEM LOR (2000):

The Ciba-Geigy RCRA Facility Investigation Report submitted to EPA in 1995 identified the Bellefont Pond Property as an Area of Concern (AOC) within the 80 Mill Street Facility. Frank Battaglia of EPA has agreed to defer this AOC to RIDEM for investigation and remediation under the Remediation Regulations, but requests to be copied on all reports and correspondence. We anticipate that EPA would issue a statement of "no further action by EPA, deferred to State Initiative" regarding this AOC in the final remedy memo for the entire Ciba Geigy site.

Joe.
EHS Remediation Specialist

Phone: 973 245 5269 Mobile: 732 762 4743 E-Mail: joseph.guarnaccia@basf.com
Postal Address: BASF Corporation, 100 Park Ave, Florham Park, N.J. 07932 USA

From: Battaglia, Frank [mailto:battaglia.frank@epa.gov]
Sent: Thursday, June 08, 2017 5:33 PM
To: Joseph F Guarnaccia <joseph.guarnaccia@basf.com>
Cc: Battaglia, Frank <battaglia.frank@epa.gov>
Subject: RE: RCRA project scope

Joe, I've been in and out of the office the past week and haven't been able to look at this but I'll get back to you on Monday. At that time we can also talk about several issues including the local soil removal in the area of the ISCO barrier as an IRM, what needs to be included in the PCB work plan that Kim will approve prior to remediation and capping, the risk assessment after soil removal and anything else that needs to be discussed.

Frank Battaglia
617 918-1362

From: Joseph F Guarnaccia [mailto:joseph.guarnaccia@basf.com]
Sent: Tuesday, June 06, 2017 4:52 PM
To: Battaglia, Frank <battaglia.frank@epa.gov>
Cc: Rick Kowalski <rkowalski@aeiconsultants.com>; Steve Graham (sgraham@aeiconsultants.com) <sgraham@aeiconsultants.com>
Subject: RCRA project scope

Frank



SEMS DocID 643666

This is a revision to the document I sent you on 5/31. Please review it and let me know of any suggested changes (additions). After EPA agrees, we need to get DEM approval.

These rules of the road need to be in place before BASF can begin design in earnest. I would like to talk to you about doing a local soil removal in the area of the ISCO barrier as a project management IRM.

At this point, BASF's intent is to remediate the property to meet the requirements for a public park as per DEM rules. The DEM is free to disapprove.

Joseph Guarnaccia Ph. D.
EHS Remediation Specialist

Phone: 973 245 5269 Mobile: 732 762 4743 E-Mail: joseph.guarnaccia@basf.com
Postal Address: BASF Corporation, 100 Park Ave, Florham Park, N.J. 07932 USA

RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-831-5508

LETTER OF RESPONSIBILITY
CASE # 2000-044

October 16, 2000

Mr. Ken Dupuis
Ciba Specialty Chemicals Corporation
Oakridge Parkway
P.O. Box 71
Tom's River, NJ 08754

R. DEMING
D. HEFFERIN
D. JAKUBOWSKI
D. WILLIAMS
M. GOODMAN
B. MCNABB
JERRY BATTY
FILE

CERTIFIED MAIL

RE: Bellefont Pond Property, Mill Street, Cranston, Rhode Island

Dear Mr. Dupuis:

On 4 September 1996 the Rhode Island Department of Environmental Management (the Department) enacted the amended Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases, (the Remediation Regulations). The purpose of these regulations is to create an integrated program requiring reporting, investigation and remediation of contaminated sites in order to eliminate and/or control threats to human health and the environment in an efficient manner. A Letter of Responsibility (LOR) is a preliminary document used by the Department to codify and define the relationship between the Department and a responsible party.

Please be advised of the following facts:

1. The Department is in receipt of the following documents regarding the Bellefont Pond Property on Mill Street, further defined as Plat 4, Lots 183, 2563 and 2682 in the Town of Cranston, Rhode Island (the site):
 - a) Site Investigation Report, Bellefont Pond Property, Mill Street, Cranston, RI.
Prepared by VHB/Vanasse Hangen Brustlin, Inc., dated December 1999.
 - b) UST Closure Assessment Bellefont Pond Property, Mill Street, Cranston, RI.
Prepared by VHB/Vanasse Hangen Brustlin, Inc., dated February 2000.
2. The above reports identify exceedances of Method 1 Residential and/or Industrial/

Office of Waste Management
Telephone (401) 222-2797 / Fax (401) 222-3812

Ciba Specialty Chemicals
LOR No. 2000-044
October 16, 2000.

Commercial Direct Exposure Criteria for VOC's, SVOC's and trace metals in soil as referenced in the Remediation Regulations. Elevated levels of vinyl chloride have been detected in groundwater on site. Sediments appear to be heavily impacted with SVOC's and metals in the vicinity of SD-1 and SD-4.

3. Although there is no promulgated Method 1 GB groundwater Criteria for vinyl chloride, the Office of Waste Management considers it to be a potential hazard to human health and the environment in trace amounts. Therefore the Office of Waste Management requires the development of a site-specific Method 2 or 3 remedial objective for vinyl chloride consistent with the projected future use of the property. In addition, site specific remedial objectives need to be developed for sediments that are protective of human health and the environment.
4. The identification of hazardous materials in the onsite soils, sediments and groundwater constitute a Release of hazardous material as outlined in Rule 3.54, 3.28 and 3.62 of the Remediation Regulations.
5. Ciba Specialty Chemicals is identified as the current owner of the site and as such is a *Responsible Party* as defined by Rule 3.60 of the Remediation Regulations.

As a result of the information known and the conditions observed at the site, the Department requests that you comply with the following:

1. Conduct a Supplemental Site Investigation, which combined with the Site Investigation Report submitted in December 1999, shall meet the requirements of a Site Investigation as defined in Rule 7.03 of the Remediation Regulations. The Supplemental Investigation shall include at a minimum:
 - a) Continue the investigation in the vicinity of TP-14 and TP-18 to determine the nature and extent of the fill, including the presence of drummed material.
 - b) Determine vertical and horizontal groundwater flow patterns across the site, and continue to investigate the nature and extent of groundwater contamination on site, particularly in the vicinity of the vinyl chloride plant. The Department recommends the installation of permanent 2" wells in impacted areas to facilitate long term monitoring of vinyl chloride. Deeper overburden wells (microwells or 2") should be installed to investigate the vertical extent of contamination. Please provide boring logs or the depths of microwells.
 - c) Determine the extent of impacted sediments in the lower pond, west of the vinyl chloride plant.
2. Submit a Supplemental Site Investigation report (SIR) which addresses the above

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referenced environmental issues. This report shall, at a minimum, include the following:

- a) A site-specific remedial objective for vinyl chloride in groundwater, consistent with Rule 8.00 Risk Management.
- b) Remedial goals for sediment which are protective of human health and the environment, consistent with Rule 8.00 Risk Management.
- c) A minimum of two remedial alternatives other than the no action/natural attenuation alternative.

The Ciba-Geigy RCRA Facility Investigation Report submitted to EPA in 1995 identified the Bellefont Pond Property as an Area of Concern (AOC) within the 80 Mill Street Facility. Frank Battaglia of EPA has agreed to defer this AOC to RIDEM for investigation and remediation under the Remediation Regulations, but requests to be copied on all reports and correspondence. We anticipate that EPA would issue a statement of "no further action by EPA, deferred to State Initiative" regarding this AOC in the final remedy memo for the entire Ciba Geigy site.

Please notify this office within thirty (30) days of the receipt of this letter of your plans to address these items. All correspondences should be sent to the attention of Margaret Bradley. If you have any questions regarding this letter or would like the opportunity to meet with Department personnel, please contact Margaret at (401) 222-2797 ext. 7105 or via e-mail to mbradley@dem.state.ri.us

Sincerely,



Doris P. Aschman, P.E.
Principal Engineer
Office of Waste Management

cc: Leo Hellested, P.E., RIDEM/Office of Waste Management
Margaret Bradley, RIDEM/Office of Waste Management
John Langlois, Esq. RIDEM/Office of Legal Services
Pamela Fromm, VHB
Frank Battaglia, EPA